



**Murphy  
Sanchez** PLLC

Christopher A Gulla, Esquire  
Direct: 856-444-5503  
Main: 267-367-5503  
Fax: 215-799-9349

[cgulla@murphysanchez.com](mailto:cgulla@murphysanchez.com)  
[www.murphysanchez.com](http://www.murphysanchez.com)

**East Gate Center  
309 Fellowship Road, Suite 200  
Mount Laurel, NJ 08054**

**File No. 9035.0003**

October 26, 2023

**VIA E-MAIL & ECF**

The Honorable Douglas Arpert  
United States Magistrate Judge  
United States District Court – District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street, Courtroom 6W  
Trenton, NJ 08608  
[dea\\_orders@njd.uscourts.gov](mailto:dea_orders@njd.uscourts.gov)

**RE: Davis v. Six Flags Great Adventure, LLC, et al  
Civil Action No.: 3:21-cv-14650**

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Dear Judge Arpert:

Please accept this submission as a Petition to immediately place Plaintiff's October 18, 2023 "Application/Petition" seeking a Protective Order (Dkt. 70) under seal. This Petition is being filed pursuant to the directions received from Your Honor during our October 26, 2023 in-person Conference. As Your Honor is aware, Plaintiff's counsel has already relayed to the Court on the record that Plaintiff has no objection to my request to place that document under seal.

During our October 26<sup>th</sup> in-person Conference, Your Honor entered a decision denying Plaintiff's "Application/Petition" (Dkt. 70) and confirming the decision to permit me two (2) additional hours to depose the Plaintiff. While doing so, Your Honor expressed that the August 25, 2023 Deposition Transcript referenced within Plaintiff's "Application/Petition" was reviewed by the Court and that the Court did not find my questioning to be inappropriate or improper in any way. As such, the contents of and arguments set forth within Plaintiff's "Application/Petition" have been rejected by the Court.

As I represented during the October 26<sup>th</sup> Conference, the substance of Plaintiff's "Application/Petition" is extremely detrimental to my character as both a legal practitioner and human being. Certain language and accusations used within the filing, which have always been vehemently denied by me and have since been rejected by the Court, put my reputation and livelihood at risk. Considering the "Application/Petition" is currently a public document, and considering my having already directed Your Honor's attention to unflattering recent media

articles that have been published for public consumption against my name based on the contents of that filing, it is absolutely imperative to me that the filing be placed under seal immediately.

Thank you for your attention to this submission and please let me know if any further filings are needed in support of this Petition.

Respectfully,

*/s/ Christopher A. Gulla*

CHRISTOPHER A. GULLA

CAG/ca

cc: Aliana Gregorio, Esquire  
Ryan Erdreich, Esquire